

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

IN THE MATTER OF:

JASON FLY LOGGING, LLC
Debtor-in-Possession.

NO.: 18-10483 -JDW
CHAPTER 11

**MOTION TO EXPEDITE HEARING ON MOTION BY JASON FLY LOGGING,
LLC TO ENTER INTO CREDIT LINE WITH DRAGON WOODLAND
CORPORATION FOR OPERATING CAPITAL
PURSUANT TO 11 U.S.C. SECTION 364**

Comes now Jason Fly Logging, LLC (“Debtor”) through counsel and its’ officers requesting the Court to expedite the hearing and reducing the time for notice to creditors and parties in interest on the Motion filed on February 14, 2018 (ECF Docket No. 6) to enter into a line of credit for operating capital with Dragon Woodland Corporation pursuant to 11 U.S.C. Section 364 (c) and (d) on an expedited basis and would assert as follows:

1. The Debtor filed a petition for relief under Chapter 11 under the US Bankruptcy Code on February 12, 2018 and order of relief was granted on same day. The Debtor is now operating its business as debtor-in-possession pursuant to 11 U.S.C. Sections 1107(a) and 1108 of the Bankruptcy Code. No request has been made for the appointment of a trustee or examiner.
2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. Sections 157 and 1334. This is a core proceeding pursuant to U.S.C. Section 157(b)(2)(A) and (D).
3. Debtor is a Mississippi limited liability corporation currently operating a logging business which is dependent on weather for operation of the business and continued revenue for operations. The weather has been rainy, snowy and muddy in past months which has inhibited the operation of the business. The Debtor without being able to cut timber and sell same is in need of interim

financing or cash infusion. Counsel has been informed they need cash infusion by the end of this week.

4. The terms of the operating line of credit are stated in motion and such funds are necessary for operation of the business as of end of this week.
5. The Debtor is unable to obtain unsecured credit for operation of the business and the Debtor's need for interim financing is compelling. The line of credit will ensure that the Debtor is able to pay the ongoing expenses that arise in the ordinary course of business and to ensure the continuous operation of the business during the pendency of the Chapter 11 case
6. The Debtor and its creditors, as well as the customers, face immediate and irreparable harm if the Court does not approve the interim financing. If the Court does not approve the line of credit the Debtor will be unable to pay the contractors, current utilities, supplies, fuel and the numerous day-to-day expenses incurred in its daily operations of the logging business and be forced to shut down. Even a temporary cessation of operations would be devastating to the Debtor's prospect of maximizing the return to creditors. In short a shutdown of business would all but rule out any chance to reorganize the Debtor's business and avoid a wasteful liquidation of the Debtor's assets.
7. The Debtor asserts there is an immediate need for an emergency hearing and requests the hearing on motion be expedited by court.

WHEREFORE, the Debtor respectfully requests entry of an order granting the relief requested expediting such hearing and further relief as is just and proper.

Respectfully submitted,

/s/ Toni Campbell Parker

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was sent to the entities or individuals listed below via facsimile, email or first class U.S. mail, postage prepaid this the 15th day of February, 2018:

Jason Fly Logging, LLC
Debtor-in-Possession
115 Jeff Sanders Rd.
Batesville MS 38606

U.S. Trustee
501 East Court St., Ste. 6-430
Jackson, MS 39201
Margaret.Middleton@usdoj.gov

Randall Fishman
Attorney for Dragon Woodland Corporation
Ballin, Ballin & Fishman PC
200 Jefferson Ave., Ste. 1250
Memphis, TN 38103
rfishman@bbfpc.com

List of Creditors Attached hereto

/s/ Toni Campbell Parker
Toni Campbell Parker